

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

TWENTIETH CENTURY FOX  
FILM CORPORATION

*Plaintiff,*

v.

JMC POP UPS LLC,  
JOSEPH MCCULLOUGH,  
AND SAMANTHA SHUTTER,

*Defendants.*

CIVIL ACTION NO. 24-CV-03021-PD

**PLAINTIFF’S MOTION FOR DEFAULT JUDGMENT**

Plaintiff, Twentieth Century Fox Film Corporation (“Plaintiff”), by and through its undersigned attorney, hereby respectfully moves this Court to: (1) enter Judgment by Default against Defendants JMC Pop Ups LLC (“Defendant JPL”), Joseph McCullough (“Defendant McCullough”), and Samantha Shutter (“Defendant Shutter”) (collectively, “Defendants”); (2) permanently enjoin Defendants from further infringing upon the copyrighted works and trademarked properties associated with Plaintiff’s *The Simpsons* and *Bob’s Burgers* television programs; (3) award statutory damages against Defendants and in favor of Plaintiff; and (4) award Plaintiff its reasonable attorneys’ fees and costs, pursuant to Fed. R. Civ. P. 55(b)(2) and Plaintiff’s Memorandum of Law in Support of Motion for Default Judgement,

which is incorporated herein by reference.

/s/ Hara K. Jacobs

Hara K. Jacobs

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